

**UNITED STATES COURT OF APPEALS  
FOR THE THIRD CIRCUIT**

NATIONAL LABOR RELATIONS  
BOARD,

Petitioner,

v.

IMAGEFIRST UNIFORM  
RENTAL SERVICE, LLC,

Respondent.

Case No. 19-1504

366 NLRB No. 182

**RESPONDENT’S ANSWER TO APPLICATION FOR ENFORCEMENT  
OF AN ORDER OF THE NATIONAL LABOR RELATIONS BOARD**

Pursuant to Rule 15(b)(2) of the Federal Rules of Appellate Procedure, Respondent ImageFIRST Uniform Rental Service, LLC (“ImageFIRST”), by its undersigned attorneys, files its Answer to Application for Enforcement of an Order of the National Labor Relations Board (the “Board”) dated August 27, 2018, in Board Case Nos. 22-CA-161563 and 22-CA-181197, reported as 366 NLRB No. 182 (the “Order”), averring as follows:

1. ImageFIRST admits this Court has jurisdiction over this case pursuant to Sections 10(e) and 10(f) of the National Labor Relations Act, as amended, 29 U.S.C. §§ 160(e) and (f) (the “Act”).
2. ImageFIRST admits that venue is proper in this Court.
3. ImageFIRST admits the Board’s final order in this matter was issued on August 27, 2018, in Board Case Nos. 22-CA-161563 and 22-CA-181197, reported as 366 NLRB No. 182.

4. ImageFIRST hereby incorporates by reference all exceptions, claims, and defenses heretofore asserted by ImageFIRST in the administrative proceedings underlying the Board's Order.

5. ImageFIRST denies that the Board is entitled to enforce its Order and respectfully requests that the Order be vacated in its entirety.

WHEREFORE, Respondent ImageFIRST Uniform Rental Service, LLC respectfully requests that the Court decline to enforce the Order and vacate the Order in its entirety.

Dated: March 27, 2019

/s/ Michael K. Taylor  
MORGAN, LEWIS & BOCKIUS LLP  
Christopher J. Murphy  
Michael K. Taylor  
1701 Market Street  
Philadelphia, PA 19103  
Tel: 215.963.5000  
Fax: 215.963.5001  
[christopher.murphy@morganlewis.com](mailto:christopher.murphy@morganlewis.com)  
[michael.taylor@morganlewis.com](mailto:michael.taylor@morganlewis.com)

**UNITED STATES COURT OF APPEALS  
FOR THE THIRD CIRCUIT**

NATIONAL LABOR RELATIONS  
BOARD,

Petitioner,

v.

IMAGEFIRST UNIFORM  
RENTAL SERVICE, LLC,

Respondent.

Case No. 19-1504

366 NLRB No. 182

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 27th day of March, 2019, a true and accurate copy of the above and foregoing Answer to Application for Enforcement of an Order of the National Labor Relations Board was served via the Court's CM/ECF system upon the following:

David Habenstreit, Esq.  
Assistant General Counsel  
National Labor Relations Board  
1015 Half Street, SE  
Washington, DC 20570  
(202) 273-0191  
[Email: appellatecourt@nrlb.gov](mailto:appellatecourt@nrlb.gov)

Julie B. Broido, Esq.  
Supervisory Attorney  
National Labor Relations Board  
1015 Half Street, SE  
Washington, DC 20570  
(202) 273-0191  
[Email: julie.broido@nrlb.gov](mailto:julie.broido@nrlb.gov)

Kellie Isbell, Esq.  
Attorney  
National Labor Relations Board  
1015 Half Street, SE  
Washington, DC 20570  
(202) 273-0191  
[Email: kellie.isbell@nrlrb.gov](mailto:kellie.isbell@nrlrb.gov)

Dated: March 27, 2019

*/s/ Michael K. Taylor*  
\_\_\_\_\_  
MORGAN, LEWIS & BOCKIUS LLP  
Christopher J. Murphy  
Michael K. Taylor  
1701 Market Street  
Philadelphia, PA 19103  
Tel: 215.963.5000  
Fax: 215.963.5001  
[christopher.murphy@morganlewis.com](mailto:christopher.murphy@morganlewis.com)  
[michael.taylor@morganlewis.com](mailto:michael.taylor@morganlewis.com)